

201-14/2/

December 19, 2005

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RETURN RECEIPT REQUESTED, PLEASE, BY E-MAIL

The Honorable Stephen L. Johnson, Administrator U.S. Environmental Protection Agency P.O. Box 1473 Merrifield, VA 22116

ATTN: Chemical Right-To-Know Program – Hexanoic acid, 2-ethyl, cobalt salt, Neodecanoic acid, cobalt salt, and Fatty acids, C9-C13 neo, cobalt salts Category

Dear Administrator Johnson:

OM Group, Inc., The Shepherd Chemical Company and Troy Corporation are please to present this test plan as part of the Metal Carboxylates Coalition commitment to the HPV program as specified in the letter from Lynne Jones on May 24, 2004. The chemicals included in this test plan are:

136-52-7 Hexanoic acid, 2-ethyl, cobalt salt 27253-31-2 Neodecanoic acid, cobalt salt 68955-83-9 Fatty acids, C9-C13 neo, cobalt salts

The sponsoring companies are OM Group, Inc., The Shepherd Chemical Company and Troy Corporation.

Attached is a copy of the test plan and supporting robust summaries. Electronic copies are also being submitted to oppt.ncic@epa.gov and chem.rtk@epa.gov.

The technical contact for this test plan is James F. Hobson, Ph.D. and he can be reached at (301) 916-4068, or by email at hobsonifxxxxxx@msn.com. Administrative questions can be directed to me at (202) 721-4157.

Sincerely,

Lynne Jones Batshon Metal Carboxylates Coalition **Executive Director**

S. Grove, OM Group, Inc. cc:

J. F. Hobson, MorningStar Consulting, Inc.

C.T. Helmes, SOCMA

A. Krygsman, Troy Corporation

B. Pelsor, The Shepherd Chemical Company